

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Lizette MUNOZ (20)**Laredo, Texas USA**

Case No.

L-20-MJ-_____

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 21, 2020 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

8 USC 1324

Offense Description

knowingly and in reckless disregard of the fact that an alien has come to, entered, or remained in the United States in violation of law, did transport and move, attempt to transport and move, and conspire to transport and move such aliens within the United States by means of transportation or otherwise, in furtherance of such violation of law

This criminal complaint is based on these facts:

On or about March 21, 2020, at approximately 5:57 pm, defendant, Lizette Munoz a United States Citizen, applied for admission into the U.S. at the Gateway to the Americas Port of Entry in Laredo, TX as a pedestrian & was accompanied by one female minor whom she claimed was her sister to CBP Officer Sang Huynh. Defendant presented a City of Laredo birth certificate bearing the name of A.H. on behalf of the minor traveling with her. Defendant stated to the primary officer that she was visiting her husband in Nuevo Laredo, Tamaulipas and that she and her sister were now headed home in Laredo, Texas. Defendant and the minor accompanying her were referred to secondary for a further status check. At secondary inspection the defendant revealed that the minor accompanying her was not her sister and not a United States Citizen. Defendant admitted that she attempted to smuggle the minor into the U.S. as her sister by using her true sister's document. Defendant further admitted that she was paid \$800 Mexican pesos & was further going to get financially compensated upon delivery of the minor. The female minor was identified as Y.E.R.M. (12 years old) & being a citizen & national of Mexico. Facts are based on the defendant's sworn statement and records of Customs and Border Protection.

☐ Continued on the attached sheet.

/s/ Liza I. Farias

Complainant's signature

Liza L. Farias, CBP Enforcement Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: March 23, 2020

Judge's signature

City and state: Laredo, Texas

Sam Sheldon, U.S. Magistrate Judge

Printed name and title